

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region I - EPA New England**

Drafted Date: October 1, 2014

Finalized Date: October 16, 2014

**SUBJECT:** Partial Compliance Evaluation of Citgo Petroleum Corporation, Rocky Hill, CT

**FROM:** Elizabeth Kudarauskas, Environmental Engineer, Air Technical Unit *EAS*

**THRU:** Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit *CMS 10/16/14*

**TO:** File

**I. Facility Information**

- A. Facility Name: Citgo
- B. Facility Location: 109 Dividend Road, Rocky Hill, CT
- C. Facility Mailing Address: same
- D. Facility Contact: John Connelly, Terminal Manager
- E. Type of Source (major/minor/sm/sm80): SM80
- F. Date Title V permit issued: NA
- G. AFS #: 0900300912

**II Background Information**

- A. Date of inspection: September 16, 2014
- B. Weather Conditions: clear, temperatures in the 70's
- C. US EPA Representative(s):
  - Beth Kudarauskas, Air Tech Unit, OES
  - Bill Osbahr, OEME
  - Mike Looney, OEME
- D. State Representative(s):
  - Mark Potash, CT DEEP
  - Charmaine Molyneaux, CT DEEP
  - Alyssa Midgette, CT DEEP
- E. Federal Requirements Discussed
  - 40 CFR Part 63 Subpart R
  - 40 CFR Part 63 Subpart BBBBBB
  - 40 CFR Part 60 Subpart XX

### III Purpose of Inspection

The purpose of this inspection was to conduct monitoring to determine whether excess VOC emissions were being emitted from the facility.

EPA also used the inspection to gather information on the storage and distribution of #6 oil and asphalt at the terminal.

### IV Facility Description

#### A. Company / Facility History

The Citgo Terminal in Rocky Hill, CT is a petroleum storage and distribution terminal. Products stored on-site include gasoline, ethanol, diesel, and home heating oil. The terminal is equipped with a vapor combustion unit to control emissions from the storage and distribution of gasoline.

#### B. Corporate Structure and CEO/President/owner name and mailing address

Citgo has a regional Safety and Environmental Manager named Don Griffin, who is located at Citgo's Perry's Island facility.

#### C. Number of Employees and Working Hours

The facility loading operations are conducted 24 hours a day, 7 days a week.

### V Inspection

#### A. Entry

The inspectors arrived unannounced at the Citgo Petroleum Terminal facility located on Dividend Road at 11:30 am. The EPA inspectors (Ms. Kudarauskas, Mr. Looney and Mr. Osbahr) showed their credentials to Mr. John Connelly, the Terminal Manager. In addition, three inspectors from CT DEEP (Mr. Potash, Ms. Molyneaux, and Ms. Midgette) were present.

#### B. Opening Conference

Mr. Connelly led the inspectors to a conference room for the opening conference. Ms. Kudarauskas explained that the purpose of the inspection was to determine Citgo's compliance with Clean Air Act Regulations. In addition, Mr. Osbahr discussed the monitoring equipment that he planned to use, including the forward looking infra-red ("FLIR") camera.

Products stored at Citgo's Rocky Hill terminal include gasoline (premium and regular), ethanol, heating oil, and diesel.

The Citgo terminal receives most products by pipeline. The facility is connected to the Buckeye

Pipeline which runs from New Haven, CT to Springfield, MA. The Citgo facility is capable of moving product in and out via pipeline. All ethanol at the Citgo facility is received by truck.

Mr. Connelly stated that there is no marine loading or unloading of products into barges at the terminal. The facility dock is no longer used. All gasoline leaves the facility by trucks (through the facility loading rack) or by pipeline. There is no #6 oil or asphalt stored at the Citgo facility.

The facility has three gasoline storage tanks and one ethanol storage tank. All of these tanks are equipped with an internal floating roof.

The facility has a truck loading rack with 3 bays. Bays 1 and 2 can bottom load product, but bay 3 is used only to receive ethanol and additives. Bays 1 and 2 are connected to the facility vapor control unit.

The facility uses a vapor combustion unit ("VCU") to control vapors from the facility.

There are no large boilers, emergency generators, parts washers or degreasers at the facility.

#### C. Plant Walkthrough

The inspectors conducted a focused walkthrough of Citgo's Rocky Hill Terminal on September 16, 2014.

The inspectors began at the loading rack. During the inspection the inspectors were able to observe several trucks loading gasoline. The EPA inspectors were able to monitor pressure and use the FLIR camera to observe any leaks in the facility vapor collection system. Using the FLIR, Mr. Osbahr did not detect any leaks at the loading rack while the trucks were loading. Mr. Osbahr also observed the facility pressure vacuum relief vent ("PVRV") using the FLIR while trucks were loading product at the rack. The FLIR did not detect any vapors from the PVRV. The VCU was operating at the time of the inspection.

The CT DEEP inspectors also brought a FLIR camera to observe emissions at the facility. The CT DEEP inspectors observed the truck loading rack and the PVRV with the FLIR camera.

In addition to using the FLIR, the inspectors attached a coupling with a pressure monitor to the vapor line at the truck loading rack. This device allows the inspectors to measure pressure in the vapor collection system. The maximum pressure observed during the inspection was 10 inches of water column.

Mr. Connelly also led the inspectors to the tank farm. Mr. Osbahr and the CT DEEP inspectors climbed to the top of one of the tanks. Mr. Osbahr observed gasoline and ethanol tanks using the FLIR camera and Mr. Osbahr detected some vapors from the roof vent on one of the gasoline

tanks. Mr. Connelly explained that the tank was currently being filled with gasoline from the pipeline.

#### D. Records Review

Ms. Kudarauskas reviewed records of the most recent monthly inspections. Mr. Connelly provided the inspectors with a copy of the air emissions permit for the facility.

The inspectors reviewed the pressure measurements that were taken as well as the FLIR videos that were collected.

#### E. Closing Conference

The inspectors conducted a brief closing conference at the end of the inspection. The inspectors reviewed the FLIR video with Mr. Connelly. The videos revealed that no significant vapor leaks were detected at the facility loading rack using the FLIR camera.

During the closing conference Citgo representatives expressed concern that the videos collected contain confidential business information. Facility representatives requested that the videos be treated as confidential business information and requested a copy of the unedited videos. Because the inspectors had no way to make a copy of the videos while at the facility, they took an inventory of the videos with Mr. Connelly and agreed to provide Citgo with a copy of the videos on CD at a later date.

The inspectors thanked Mr. Connelly for his time and left the facility at approximately 4:00 pm.

#### F. Follow up

Ms. Kudarauskas mailed a copy of all the unedited videos collected during the inspection to Mr. Connelly on October 16, 2014.